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Via ECF

April 18, 2025

The Honorable Jennifer E. Willis, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Charles v. Pinnacle Too, LLC., et al.*
Case No.: 22-cv-4232 (DEH)(JW)

Dear Judge Willis:

This office represents Plaintiff in the above-referenced matter. On March 17, 2025, the Court: (i) granted the motion to withdraw as counsel filed by the prior counsel to Defendants Pinnacle Too, LLC, Agir Electrical, LTD, and Antony Girona (the “Pinnacle Defendants”), and (ii) stayed the case for 30 days to permit Pinnacle Defendants time to obtain new counsel.

Pursuant to the Court’s order, the stay lifts on April 18, 2025. Accordingly, Plaintiff will begin distribution of the class notice (Dkt. No. 155) on Monday April 21, 2025.

To date, no new counsel has appeared for Pinnacle Defendants. While the Individual Defendant Antony Girona can proceed pro se, the Defendants Pinnacle Too, LLC, and Agir Electrical, LTD cannot represent themselves. Plaintiff requests leave to move for default judgment by May 21, 2025, as against Defendants Pinnacle Too, LLC, and Agir Electrical, LTD. Defendants FrankCrum6, Inc. d/b/a FrankCrum and Frank Crum Jr. are presently represented by counsel. *See* Dkt. No. 177.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ C.K. Lee
C.K. Lee, Esq.

cc: all parties via ECF